

EXHIBIT A

PROPOSED DISCOVERY

Document Requests and Interrogatory to Plaintiff

1. **Document Request 1:** Provide copies of your job offer from Audacy, if any, and any correspondence concerning your potential employment with Audacy, vaccine requirements at Audacy, or medical exemptions from Audacy's vaccine requirements.
2. **Interrogatory No. 1:** State whether you have ever received medical advice from a licensed doctor indicating that you should be medically exempted from receiving any COVID-19 vaccine, and if so, state the substance of the advice and the medical reasons justifying an exemption.
3. **Document Request 2:** If your response to Interrogatory No. 1 is yes, provide medical records supporting your answer to Interrogatory No. 1.
4. **Document Request 3:** Provide financial and mortgage documents supporting your claim that you will lose your home if you are not granted an injunction against Scripps' non-compete agreement, including documents reflecting the balances in your savings and/or checking accounts, brokerage accounts, retirement accounts, or other financial accounts; documents reflecting the amount of your monthly mortgage payments; records reflecting your payment

and/or non-payment of your mortgage in December 2021, January 2022, and February 2022; and records reflecting the monthly income of your spouse.